

**Attachment A: FCRHA Policy on Maintaining Reasonable Income Mix Within Public
Housing Program Developments**

Attachment A

FCRHA POLICY STATEMENT ON MAINTAINING REASONABLE INCOME MIX WITHIN PUBLIC HOUSING PROGRAM DEVELOPMENTS (DECONCENTRATION OF POVERTY)

Purpose

Section 16 (a) of the United States Housing Act, as amended by Section 513 of the Quality Housing and Work Responsibility Act of 1998, prohibits a Public Housing Authority (PHA) from concentrating very low-income families, or other families with relatively low-incomes, in certain public housing projects, or certain buildings within projects. The Act also provides that 40 percent of all new admissions in public housing shall be families whose income at the time of their admission does not exceed 30 percent of the median income for the area. The PHA's admission policy may establish and utilize income-mix criteria designed to avoid concentration of very low income families in certain public housing developments and to ensure income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects.

Under HUD's final rule dated October 21, 1999, on preparing the 5-Year and Annual Plans, PHAs are considered to be in compliance with the Act's income mixing requirements (avoiding the concentration of poverty) if they determine the average incomes of families in their developments, defining high income developments as those with family incomes over 115 percent of the average and low income developments as those with family incomes under 85 percent of the average.¹ Problem developments are dealt with by either admitting higher income tenants where the development has lower income levels and lower income tenants where the development has higher income levels.

In reviewing the FCRHA's existing admission policy for public housing, the Department of Housing and Community Development (HCD) analyzed the profiles of all public housing families being served as of October 2005, to determine how tenant income levels compare at each of FCRHA's project developments. Table 1 on page 4 presents the results of this analysis.

Current Policy Statement and Results of Analysis

The current policy statement of the FCRHA Public Housing Admissions and Occupancy Policy is that HCD must avoid concentrations of the most economically and socially deprived families in any one or all of the FCRHA's public housing projects. The policy does not provide for incentives to bring higher income tenants into lower income project areas and lower income tenants into higher income project areas. HCD found that the income levels for families in FCRHA public housing developments generally show adequate income mixing in conformance with FCRHA's Admissions and Occupancy policy. FCRHA's standards for tenant selection for public housing developments states that the

¹ On January 19, 2001, HUD provided further guidance to PHAs on deconcentration of poverty and income mixing. The FCRHA policy statement was not affected by this new guidance.

Policy Statement

Based on HUD's October 21, 1999, income mixing guidance, the FCRHA income mixing policy statement was modified to include the following additional measures to the existing standards for tenant selection.

1. In order to ensure relative parity among its housing developments, HCD will analyze the income levels of public housing tenants on a continuous twelve-month timetable to determine the average incomes of families in their developments, defining high income developments as those with family incomes over 115 percent of the average and low income developments as those with family incomes under 85 percent of the average. Problem developments are dealt with by either admitting higher income tenants where the development has lower income levels and lower income tenants where the development has higher income levels.
2. HCD will then identify those developments that are more than 15 percent above and below the average income of all families in our developments.
3. When a development is identified as having tenant income at 15 percent above or below the average income of all families in our developments as noted in step 2, HCD will implement a tenant selection procedure at the development that will give preference to either placing higher income tenants where the development has lower income tenants and lower income tenants where the development has higher income tenants.
4. The effective date for this policy is admissions taking place after October 1, 2000. This policy was revised for FY 2006 plan date. HCD will review the properties on a yearly basis instead of every 6 months.

Table I
Concentration of Poverty, Public Housing

Concentration of Poverty, Public Housing				
Development	Total Units/Leases	Average Household Income	Developments With Average Incomes Above 115 %	Developments With Average Incomes Below 115 %
			(Lower Income Families Needed)	(Higher Income Families Needed)
Family Properties				
Rosedale Manor	70	\$21,436	No	No
Newington Station	36	19,654	No	No
The Park	24	20,391	No	No
Shadowood	17	17,646	No	No
The Atrium	15	16,778	No	Yes
Villages of Falls Church	29	16,285	No	Yes
Heritage I	20	26,985	Yes	No
Robinson Square	46	30,420	Yes	No
Heritage Woods South	15	19,052	No	No
Sheffield Village	8	18,624	No	No
Greenwood	94	17,405	No	Yes
Briarcliff II	20	19,279	No	No
West Ford II	22	19,445	No	No
West Ford I	23	21,065	No	No
West Ford III	57	19,409	No	No
Barros Circle	42	15,559	No	Yes
Belle View	32	15,746	No	Yes
Kingsley Park	103	21,259	No	No
Heritage Woods North, Colchester, Springfield Green	25	26,644	Yes	No
Reston Town Center	30	21,165	No	No
Old Mill Gardens	51	15,787	No	Yes
Ragan Oaks	51	20,888	No	No
Tavener Lane	12	22,284	No	No
Water's Edge	9	19,565	No	No
The Green/West Glade	48	24,233	Yes	No
Greenwood II & Barkley	7	25,912	Yes	No
Average Family Incomes		<u>\$20,497</u>		
115 Percent Above the Average Income of All Families				\$23,571
115 Percent Below the Average Income of All Families				\$17,422